

June 7, 2001

Mr. Tori Patterson  
Trelleborg Automotive  
P.O. Box 7007  
Logansport, Indiana 46947-7007

Re: 017-14063  
Minor Source Modification to:  
Part 70 permit No. 017-7639-00014

Dear Mr. Patterson:

Trelleborg Automotive was issued a Part 70 operating permit 017-7639-00014 on August 31, 1999 for a stationary fabricated rubber products manufacturing operation. An application to modify the source was received on March 12, 2001. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

One adhesive roll coater (ARC-1), with a maximum capacity of 5,400 metal sleeves per hour, exhausting to stack S-7692.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions  
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

Operating conditions shall be incorporated into the Part 70 operating permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12.

Pursuant to Contract No. A305-0-00-36, IDEM, Office of Air Quality has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Mike Pring, ERG, P.O. Box 2010, Morrisville, North Carolina 27560, or call (919) 468-7840 to speak directly to Mr. Pring. Questions may also be directed to Duane Van Laningham at IDEM, Office of Air Quality, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original Signed by Paul Dubenetzky

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

Permit  
Affidavit of Construction

ERG/MP

cc: File - Cass County  
Cass County Health Department  
Air Compliance Section Inspector - Ryan Hillman  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

# **PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT**

**Trelleborg Automotive YSH, Inc.  
One General Street  
Logansport, Indiana 46947**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T017-7639-00014	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: August 31, 1999

First Minor Source Modification 017-11310-00014, issued October 19, 1999  
First Administrative Amendment 017-12246-00014, issued August 22, 2000

Second Minor Source Modification 017-14063-00014	Pages Affected: 35a, 35b, 40, 40a, 40b,
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: June 7, 2001

## SECTION D.4

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

One adhesive roll coater (ARC-1), with a maximum capacity of 5,400 metal sleeves per hour, exhausting to stack S-7692.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Input of VOC to the adhesive roll coater (ARC-1) shall be limited to less than twenty-five (25) tons of VOC per consecutive 12-month period, rolled on a monthly basis. Compliance with this limit makes 326 IAC 8-1-6 (New facilities; general reduction requirements) not applicable.

#### D.4.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), the Volatile Organic Compound (VOC) usage from all the coating facilities at the source shall be limited to less than 245 tons (this includes VOC from coatings, dilution solvents, and cleaning solvents), per 12 consecutive month period, rolled on a monthly basis. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period, rolled on a monthly basis for the entire source (five (5) tons have been allotted to the insignificant activities). Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

#### D.4.3 New Source Toxics Control [326 IAC 2-4.1]

Input of HAPs to the adhesive roll coater (ARC-1) shall be limited to less than twenty-five (25) tons of any combination of HAPs, and less than ten (10) tons of each individual HAP per consecutive 12-month period, rolled on a monthly basis, including coatings, dilution solvents, and cleaning solvents. Compliance with this limit makes 326 IAC 2-4.1 (New source toxics control) not applicable.

### Compliance Determination Requirements

#### D.4.4 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC and HAP content and usage limitations contained in Conditions D.4.1, D.4.2, and D.4.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

#### D.4.5 VOC and HAP Emissions

Compliance with Conditions D.4.1, D.4.2, and D.4.3 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound and HAP usage for the most recent twelve (12) month period.

### Record Keeping Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.4.6 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.1, D.4.2 and D.4.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Condition D.4.1, D.4.2 and D.4.3.

- (1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The volume weighted VOC and HAP content of the coatings used for each month;
  - (4) The cleanup solvent usage for each month;
  - (5) The total VOC and HAP usage for each month; and
  - (6) The weight of VOCs and HAPs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.4.7 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.4.1, D.4.2, and D.4.3 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

## OFFICE OF AIR MANAGEMENT

### COMPLIANCE DATA SECTION

### Part 70 Quarterly Report

Source Name: Trelleborg Automotive YSH, Inc.  
Source Address: One General Street, Logansport, Indiana 46947  
Mailing Address: P.O. Box 7007, Logansport, Indiana 46947-7007  
Source Mod.No: 017-14063-00014  
Facility: All coating facilities  
Parameter: Volatile Organic Compound (VOC)  
Limit: The Volatile Organic Compound (VOC) from all the coating facilities at the source shall use less than 245 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period, rolled on a monthly basis. Five (5) tons have been attributed to insignificant facilities.

YEAR: \_\_\_\_\_

Month	Column 1		Column 2		Column 1 + Column 2	
	Spray Coating This Month	Dip Coating This Month	Spray Coating Previous 11 Months	Dip Coating Previous 11 Months	Spray Coating 12 Month Total	Dip Coating 12 Month Total
Month 1						
Month 2						
Month 3						

Month	Column 1		Column 2		Column 1 + Column 2	
	Roll Coating This Month	Solvent This Month	Roll Coating Previous 11 Months	Solvent Use Previous 11 Months	Roll Coating 12 Month Total	Solvent Use 12 Month Total
Month 1						
Month 2						
Month 3						

9 No deviation occurred in this quarter.  
9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Source Modification Quarterly Report**

Source Name: Trelleborg Automotive YSH, Inc.  
Source Address: One General Street, Logansport, Indiana 46947  
Mailing Address: P.O. Box 7007, Logansport, Indiana 46947-7007  
Source Modification No: 017-14063-00014  
Facility: Adhesive roll coater (ARC-1)  
Parameter: Volatile Organic Compounds (VOC)  
Limit: Input of VOC to the Adhesive roll coater (ARC-1) shall be limited to less than twenty-five (25) tons per twelve (12) month consecutive period, rolled on a monthly basis.

YEAR: \_\_\_\_\_

Month	VOC Input (tons)	VOC Input (tons)
	This Month	12 Month Total
Month 1		
Month 2		
Month 3		

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Source Modification Quarterly Report**

Source Name: Trelleborg Automotive YSH, Inc.  
Source Address: One General Street, Logansport, Indiana 46947  
Mailing Address: P.O. Box 7007, Logansport, Indiana 46947-7007  
Source Modification No: 017-14063-00014  
Facility: Adhesive roll coater (ARC-1)  
Parameter: Hazardous Air Pollutants (HAPs)  
Limit: Input of HAPs to the adhesive roll coater (ARC-1) shall be limited to less than twenty-five (25) tons of any combination of HAPs, and ten (10) tons of any single HAP per twelve (12) month consecutive period, rolled on a monthly basis.

YEAR: \_\_\_\_\_

Month	HAP Input (tons)		HAP Input (tons)	
	This Month		12 Month Total	
	Single HAP	All HAPs	Single HAP	All HAPs
Month 1				
Month 2				
Month 3				

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.



## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Part 70 Minor Source Modification

#### Source Background and Description

Source Name: Trelleborg Automotive  
Source Location: One General Street, Logansport, Indiana 46947  
County: Cass  
SIC Code: 3069  
Operation Permit No.: T 017-7639-00014  
Operation Permit Issuance Date: August 31, 1999  
Minor Source Modification No.: 017-14063-00014  
Permit Reviewer: ERG/MP

The Office of Air Quality (OAQ) has reviewed a modification application from Trelleborg Automotive relating to the construction of the following emission units and pollution control devices:

One adhesive roll coater (ARC-1), with a maximum capacity of 5,400 metal sleeves per hour, exhausting to stack S-7692.

#### History

On March 12, 2001, Trelleborg Automotive submitted an application to the OAQ requesting to add an adhesive roll coater to their existing plant. Trelleborg Automotive was issued a Part 70 permit on August 31, 1999.

#### Enforcement Issue

There are no enforcement actions pending.

#### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S-7692	Roll Coater (ARC-1)	26	1.33	1,800	ambient

#### Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on March 12, 2001.

## Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 and 2).

### Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0
PM-10	0
SO <sub>2</sub>	0
VOC	45.13
CO	0
NO <sub>x</sub>	0

HAP's	Potential To Emit (tons/year)
Xylene	15.50
Toluene	28.38
Ethylbenzene	1.25
Carbon Tetrachloride	0.01
TOTAL	45.14

### Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(7) as the source has requested a VOC limit of 13 tons per year which makes 8-1-6 not applicable.

### County Attainment Status

The source is located in Cass County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Cass County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

- (b) Cass County has been classified as attainment or unclassifiable for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO <sub>2</sub>	less than 100
VOC	less than 250
CO	less than 250
NOx	less than 250

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the TSD for T017-7639-00014. VOC emissions are limited to less than 250 tons per year by permit conditions, and the unlimited PTE for all other pollutants is less than 100 tpy. Actual VOC emissions for year 2000 were 210 tpy.

### Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Adhesive Roll Coater (ARC-1)	0	0	0	13	0	0	25

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

### **State Rule Applicability - Individual Facilities**

#### **326 IAC 2-2 (Prevention of Significant Deterioration)**

This rule does not apply to the adhesive roll coater (ARC-1) because facility-wide VOC emissions are limited to less than 250 tons per year.

#### **326 IAC 2-4.1-1 (New Source Toxics Control Rule)**

The adhesive roll coater (ARC-1) is not subject to 326 IAC 2-4.1 (New Source Toxics Control), because HAP emissions are limited to less than 25 tons per year of any combination of HAPs, and less than 10 tons per year of any individual HAP.

#### **326 IAC 2-6 (Emission Reporting)**

The facility is subject to 326 IAC 2-6 (Emission Reporting), because the source emits more than 100 tons/yr of VOC. Pursuant to this rule, the owner/operator of this facility must annually submit an emission statement of the facility. The annual statement must be received by July 1 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

#### **326 IAC 6-3-2 (Process Operations)**

There are no PM emissions from the adhesive roll coater (ARC-1), therefore 6-3-2 does not apply.

#### **326 IAC 8-1-6 (New Facilities; General Reduction Requirements)**

This rule does not apply to the adhesive roll coater (ARC-1) because VOC emissions are limited to 25 tons per year.

#### **326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)**

This rule does not apply to the adhesive roll coater (ARC-1) because the SIC code of the operation is 3069 which is not one of the SIC codes covered by this rule.

### **Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

### **Conclusion**

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 017-14063-00014.

**Appendix A: Emissions Calculations**  
**VOC and Particulate**  
**From Surface Coating Operations**

Page 1 of 2 TSD App A

**Company Name:** Trelleborg Automotive  
**Address City IN Zip:** PO Box 7007, Logansport, Indiana 46947  
**MSM#** 017-14063  
**Plt ID:** 017-00014  
**Reviewer:** ERG/MP  
**Date:** 4/15/01

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Adhesive	8.00	79.50%	0.0%	79.5%	0.0%	15.00%	0.000300	5400.000	6.3600	6.3600	10.3032	247.2768	45.1280	0.0000	42.40	100%

**State Potential Emissions** 10.30 247.28 45.13 0.00

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
Total PM = Worst topcoat + Worst Stain  
Total VOC = Worst topcoat + Worst Stain + Cleaner

**Appendix A: Emissions Calculations  
HAP Emissions  
From Surface Coating Operations**

Page 2 of 2 TSD App A

**Company Name: Trelleborg Automotive  
Address City IN Zip: PO Box 7007, Logansport, Indiana 46947  
MSM# 017-14063  
Plt ID: 017-00014  
Reviewer: ERG/MP  
Date: 4/15/01**

Material	Density	Gallons of Material	Maximum	Transfer Efficiency	Weight %	Weight %	Weight %	Weight %	Xylene	Ethylbenzene	Toluene	Carbon Tetrachloride
	(Lb/Gal)	(gal/unit)	(unit/hour)	pct	Xylene	Ethylbenzene	Toluene	Carbon Tetrachloride	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)
Adhesive	8.00	0.000300	5400.000	100.00%	27.30%	2.20%	50.00%	0.01%	15.50	1.25	28.38	0.01

Total State Potential Emissions	<b>15.50</b>	<b>1.25</b>	<b>28.38</b>	<b>0.01</b>
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**METHODOLOGY**

Volatile HAPs emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

Particulate HAPs emission rate (tons/yr) = [Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs]\*[1 - Transfer Efficiency]